

Adopted 9/15/98

## **POLICY POSITION PAPER FOR THE CALFED BAY-DELTA PROGRAM**

### **The Metropolitan Water District of Southern California**

#### **Preamble**

Metropolitan and its 27 public member agencies provide water to 16 million people in a six-county service area in Southern California. Metropolitan is communicating this policy position (policy) because CALFED is in the process of developing a preferred alternative to solve the problems associated with Bay-Delta, a vital resource for this region. Metropolitan has become increasingly troubled regarding the recent shift by CALFED away from selecting a technically superior Alternative, which CALFED analysis indicates should include a dual conveyance facility in the Delta. Instead, CALFED has defined a phased decision-making approach, which to date includes no clear commitment to provide water quality and reliability benefits for urban California. We feel compelled to clarify our position with this statement of Metropolitan's needs and interests. We recognize that CALFED is attempting to develop solutions that address multiple interests, such as environmental restoration, levee improvements, water quality and supply reliability. We believe that our needs, as described in this policy, can be achieved in conjunction with the needs of the rest of the State. We also believe that continued support and consensus building by stakeholders is dependent upon CALFED's pursuit of a balanced and technically supportable solution.

#### **Metropolitan's Objectives**

- **Public Health Protection.** Metropolitan requires a safe drinking water supply from the Bay-Delta in order to meet current and future regulatory requirements and to protect public health, achieved through reduced levels of total organic carbon (TOC), bromide, pathogens and other unknown contaminants.
- **Salinity Management.** Metropolitan requires source water from the Bay-Delta that is consistently low in salinity in order to implement local water recycling and groundwater programs (for demand management) and to minimize economic impacts on residential and industrial users.
- **Supply Reliability.** Metropolitan must have protection for its existing Bay-Delta supplies and have access to (and conveyance capability for) wet year water for storage in order to reduce its future reliance on Delta supplies during dry years, when impacts to fisheries and ecosystem are most severe.
- **Assurance.** Metropolitan must be assured that all of CALFED's stated purposes will be met and all components of the Bay-Delta solution will be implemented to provide regional and statewide benefit. An implementation agreement must be developed to ensure efforts to

achieve CALFED's objectives move in parallel and on a balanced schedule. Funding and implementation of ecosystem restoration, in-stream quality improvements, and levee repairs should not proceed unless commensurate funding and implementation of safe drinking water quality, salinity control, and supply reliability also occurs.

### **Metropolitan's Concerns**

- ***Staging approach may jeopardize long-term, best solution.*** Metropolitan is deeply concerned that CALFED's proposed staging approach puts off making difficult but crucial decisions regarding the long-term, best solution to the problems in the Bay-Delta. CALFED has chosen a staged approach, which emphasizes development of "soft path" programs in the near-term and has pushed back making a decision regarding an isolated facility.
- ***CALFED's proposed Stage 1 actions do little to improve water quality.*** CALFED's proposed Stage 1 actions, while potentially providing for some supply reliability improvements, do very little to improve export water quality. Improved water quality from a CALFED solution is essential to Southern California for public health protection and salinity management.
- ***Political issues not directly addressed.*** Metropolitan understands the political issues surrounding implementation of an isolated facility. Many of these issues center on the perception that if an isolated facility is constructed, then Southern California will "drain" the Delta and then abandon Delta programs, such as environmental restoration, in-stream quality improvements, and levee stability. Metropolitan believes that CALFED has not addressed these issues in a straightforward manner and that two important messages must be stated concerning these issues: (1) Metropolitan and its member agencies have made and are committed to continuing to make enormous investments in developing alternative "soft path" water supplies, which reduce Southern California's reliance on Delta water; and (2) Metropolitan supports solutions that are balanced and believes that an isolated facility if it is coupled with needed through-Delta investments for ecosystem restoration, in-stream water quality, and levee stability could meet all of CALFED's objectives. Metropolitan is willing to firmly link the objectives and implementation elements necessary to meet all of CALFED's objectives with specific and interlocking assurances.

### **What CALFED Must Provide**

Technical studies indicate that an isolated facility, in conjunction with through-Delta improvements, is best able to achieve CALFED's stated objectives. We concur with the findings as a statement of technical fact. Regardless of which alternative is ultimately chosen, it must meet the following requirements:

- ***Ensure healthy and safe drinking water.*** Delta export water must be reduced to 3 milligrams per liter for total organic carbon (TOC) and 45 micrograms per liter for bromide, during both wet and dry years, to provide for public health protection. These values are consistent with target values established by an independent panel of water quality experts. Average levels at

Metropolitan's intakes currently range from 2 to 4 milligrams per liter for TOC and 107 to 385 micrograms per liter for bromide (bromide is six times the national average). When source water containing TOC and bromide is treated, disinfection by-products are formed, some of which are suspected carcinogens and have been linked to miscarriages. In addition to known contaminants, a high quality source water is needed to provide a safe water supply and reduce the risk of unknown contaminants.

- ***Provide source water low in Salinity.*** Salinity of Delta export water must be reduced to approximately 150 parts per million, both in wet and dry years, in order to continue to implement water recycling and groundwater programs. Average levels of salinity in Delta water at Metropolitan's intake currently range from 218 to 415 parts per million. Each year about 600,000 tons of salt accumulate in Southern California, which greatly jeopardizes the region's ability to implement existing and new local water management programs. Source water high in salinity also has multimillion dollar impacts on residential and industrial users.
- ***Ensure supply reliability.*** Although Metropolitan's water management strategy is to greatly reduce its reliance on Delta water during a drought, ensuring reliability of Delta water is essential. Reliability must be achieved in three areas: (1) near-term reliability must be achieved through extending the Bay-Delta Accord and providing assurances against future regulations that could reduce existing SWP supplies; (2) greater operational flexibility in the SWP system is needed to allow Metropolitan access to water in wet years for storage -- Metropolitan must be able to take up to its 2.0 million acre-foot entitlement during wet years, when impacts to fisheries are minimal; (3) storage and voluntary water transfers are essential water management tools that are required in order to reduce reliance on Delta water during drought periods; and (4) some additional State Water Project supplies, above Accord levels, are needed in the long-term to ensure reliability consistent with the region's Integrated Resources Plan.
- ***Conduct necessary feasibility studies and environmental permitting.*** If a staged approach is implemented, all feasibility studies, and environmental permitting must be completed during Stage 1 to ensure that no time or money is lost and that required conveyance and surface storage projects will be operational when needed.

### **What Metropolitan Will Provide**

- ***Commitment to developing "soft path" supplies.*** Metropolitan and its member agencies have developed and will continue to develop conservation, recycling, and groundwater programs to reduce Southern California's dry year dependence on Delta water. However, this strategy of maximizing our local water supplies is contingent upon a successful CALFED solution that improves the quality of source water from the Delta.

Conservation and Recycling: Southern California is currently conserving and recycling over 700,000 acre-feet of water per year, representing the entire water demand of the City of Los Angeles. Metropolitan has invested over \$130 million to date for conservation and recycling, which was matched by even greater investments by local

agencies. Metropolitan's Integrated Resources Plan (IRP) calls for expanding conservation and recycling by 128% over current levels by 2020.

Groundwater Storage and Transfers: Metropolitan has developed several groundwater conjunctive use storage programs in its service area and Central Valley, totaling over 800,000 acre-feet. Metropolitan's IRP calls for expanding conjunctive use storage in its service area and calls for developing an additional 300,000 acre-feet of voluntary water transfers in the Central Valley to be used primarily during dry years.

- ***Reduced reliance on Delta water during dry years.*** These alternative "soft path" supplies are geared to reducing Southern California's reliance on Delta water during dry years. Past projections indicated that Metropolitan would require its full SWP entitlement of 2.0 million acre-feet during a drought (representing 30 percent of the region's total needs). Current IRP projections indicate that Metropolitan will only need about 33 percent of its SWP entitlement during a critical drought year, such as a repeat of 1991 (representing 13 percent of the region's total needs). Metropolitan and its member agencies are committed to this strategy and support developing a Delta operating plan that ensures Southern California's reduced reliance on SWP supplies during drought periods; but this reduced reliance will require the above stated--water quality, transfer capability, and storage.

### **Consequences of CALFED's Failure**

Metropolitan has invested heavily in supporting the CALFED program. It will be a tragedy if CALFED fails to meet its objectives. The consequences of CALFED's failure to resolve the problems in the Bay-Delta are enormous for the State and Southern California -- in terms of public health, cost, and environmental resources.

Metropolitan and its member agencies have invested hundreds of millions of dollars to greatly improve the Southern California's management and development of local water supplies during the 1990's. We believe the continuance of this new water ethic is vital to the success of any long-term solution to the Bay-Delta. But this success can only be possible with a CALFED program that meets balanced objectives.

Southern California must have improved source water quality from the Bay-Delta. Our development of water management programs, such as recycling and groundwater storage, depend on reduced salinity of Delta water. Without improvements in salinity, our reliance on Delta water during droughts would shift back to pre-1990 levels. Southern California's public health protection is also at stake. Current levels of TOC and bromide in export water from the Delta are not acceptable. Unknown contaminants in Delta export water are also of concern. Finally, unless supply reliability is improved, Southern California's \$500 billion economy, quality of life, and environment will be threatened.